

DANIEL J. BRODERICK, Bar #89424
Federal Defender
MATTHEW C. BOCKMON, Bar #161566
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, California 95814
Telephone: (916) 498-5700

Attorneys for Defendant
JAMES E. BLEDSOE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	NO. CR-S-04-0026-WBS
)	
Plaintiff,)	
)	STIPULATION AND [PROPOSED] ORDER
v.)	CONTINUING STATUS CONFERENCE
)	
JAMES E. BLEDSOE and)	
SUSAN E. D'ORTA, aka)	DATE: July 23, 2007
Susan Mason)	TIME: 8:30 a.m.
)	JUDGE: William B. Shubb
Defendants.)	
)	
)	

It is hereby stipulated and agreed to between the United States of America through Matthew Segal, Assistant United States Attorney; defendant, JAMES BLEDSOE, by and through his counsel, Matthew C. Bockmon, Assistant Federal Defender; and defendant, SUSAN D'ORTA, by and through her counsel, Dwight M. Samuel, Esq., that the status conference presently scheduled for hearing on June 25, 2007, be vacated and rescheduled for status conference on July 23, 2007, at 8:30 a.m.

The parties continue to work towards a resolution of the matter, and are exchanging discovery regarding loss and restitution; counsel

needs additional time to consult with their out-of-district clients regarding such loss and restitution.

IT IS FURTHER STIPULATED that the period June 25, 2007, through and including July 23, 2007, be excluded in computing the time within which trial must commence under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv) and Local Code T4 for continuity and preparation of counsel and 18 U.S.C. § 3161(h)(8)(B)(ii) and Local Code T2 for complexity.

IT IS FURTHER STIPULATED that the parties agree to toll the statute of limitations from the date of this stipulation until July 23, 2007, for any offenses for which the statute of limitations has not expired.

Dated: June 22, 2007

Respectfully submitted,

DANIEL J. BRODERICK
Federal Defender

/s/ Matthew C. Bockmon

MATTHEW C. BOCKMON
Assistant Federal Defender
Attorney for Defendant
JAMES E. BLEDSOE

/s/ Matthew C. Bockmon for
Dwight M. Samuel

DWIGHT M. SAMUEL
Attorney for Defendant
SUSAN E. D'ORTA
per telephonic authority

//

//

1 Dated: June 22, 2007

2 MCGREGOR W. SCOTT
3 United States Attorney

4 /s/ Matthew Segal

5 MATTHEW SEGAL
6 Assistant U.S. Attorney
7 per telephonic authority

8 **O R D E R**

9 IT IS SO ORDERED.

10 Dated: June 22, 2007

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12 WILLIAM B. SHUBB
13 UNITED STATES DISTRICT JUDGE
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